TITLE I, PART A
Compliance Monitoring Guide
Nevada Department of Education – August 2014

1 About this Document

This document summarizes the policies and procedures of the Nevada Department of Education's Title I, Part A monitoring of Local Education Agencies receiving Title I, Part A federal funding from the Elementary and Secondary Education Act of 2001.

1.1 Intended Audience

This document is intended for district personnel, administrators, teachers, parents, community members and Nevada Department of Education (NDE) staff who are interested in the Title I, Part A program monitoring process.

1.2 Organization

This document is organized as follows:

Section	Contents	Page
Section 1	About this Document	2
Section 2	Introduction	3
Section 3	Desk Top Monitoring	3
Section 4	On-site Monitoring	10
Section 5	Progression of Consequences	15

1.3 Terms and Components

The following abbreviations, terms and components are used in the document:

1.3.1 Abbreviations

Abbreviation	Meaning
21st CCLC	21st Century Community Learning Centers
EDT	Equitable Distribution of Teachers
ELL	English Language Learner
EPP	Education Programs Professional (NDE staff)
eNOTE	Electronic Nevada On-line Tracking and Evaluation
ESEA	Elementary and Secondary Education Act
PIP	Parent Involvement Policy
Pre-K	Pre-Kindergarten or Preschool
LEA	Local Education Agency
NCLB	No Child Left Behind
NDE	Nevada Department of Education
PD	Professional Development
SEA	State Education Agency
SPP	School Performance Plan

1.3.2 Components of the Title I, Part A Monitoring

For LEAs receiving Title I-A funding, there is a 4 year cycle for Title I, Part A monitoring. For 3 years, a Title I LEA is required to participate in Fall and Spring desk-top monitoring through the on-line monitoring tool, eNOTE Tracker. In the 4th year, a Title I LEA must participate in On-site monitoring, which consists of completing the eNOTE Tracker on-site portion as well as participate in an on-site monitoring visit conducted by NDE staff.

Components	Overview of Monitoring Activity
Desk Top Monitoring	LEAs complete and submit the Title I-A Desktop eNOTE Tracker Fall and Spring compliance monitoring items for review and approval by NDE staff. This occurs for 3 years out of the 4 year cycle.

On-site Monitoring	LEAs participate in 2 parts of Title I-A On-site monitoring, which occurs at least once every 4 years: 1. On-site eNOTE Tracker compliance monitoring completed and submitted on-line by LEAs; and 2. On-site monitoring visit conducted by NDE staff.

2   Introduction

Federal law requires that the NDE monitor the operation of Title I-A programs in every participating LEA. The NDE developed this monitoring system during the 2009-2010 school year, and has updated the process as reflected in this guide. It is based on careful review of all federal requirements, with consideration given to the unique circumstances of Nevada, and with attention given to the monitoring systems of other states.

2.1 Introduction to the Title I, Part A Monitoring Guide

The Monitoring Guide describes the Title I-A monitoring cycles/schedule, processes, protocols and tools. It covers the Desktop and On-site Review Process that is conducted through the on-line eNOTE Tracker tool and the On-site Compliance Monitoring Visit.

There are tools, protocols and materials available to districts and other interested parties that are referenced throughout the document. Hyperlinks have been provided in order to access all documents and tools. All of the resource materials will provide additional information related to the compliance monitoring process.

3   Desktop Monitoring

Desktop monitoring occurs annually via the web-based system, eNOTE Tracker. Three out of the 4 years of the monitoring cycle or schedule, LEAs are required to participate in the Fall and Spring Desktop Compliance Monitoring. At least once every 4 years, LEAs are required to complete the On-site Desktop Compliance Monitoring, in addition to an On-site Monitoring visit conducted by NDE staff. The On-site Monitoring schedule can be found at http://www.doe.nv.gov/Programs_Services/Title_I/Part_A/Monitoring/ .

3.1 eNOTE Tracker

A web-based, on-line system called "eNOTE Tracker" is used to conduct the required Desktop Compliance Monitoring for Title I, Part A. eNOTE Tracker can be found at the following website https://enote.doe.nv.gov/. The eNOTE Tracker system contains all required compliance monitoring elements for Title I, Part A, such as the monitoring criteria questions, categories, items, required documents/evidence, legal citations, resources and the electronic file cabinet for uploading evidence documents.

Each year during desktop monitoring, LEAs are require to either complete Fall and Spring Desktop compliance monitoring items or the On-site Desktop compliance monitoring items.

3.1.1   eNOTE Tracker Access and Use

An eNOTE Tracker User Manual can be found on the NDE website http://www.doe.nv.gov/Programs_Services/Resources/Tools/ . The manual describes how to navigate the tracker on-line system, including how to log-in, find guidance and resource documents as well as the progressions of submittal, review, and approval of the compliance items.

Appropriate district level staff have been assigned to their LEAs and have been provided administrative access. If an LEA would like additional staff assigned or staff removed, the LEA may add (or remove) those staff members themselves. Directions on how to add and remove users can be found in the eNOTE Tracker User Manual.

In the event an LEA experiences issues in this area, an LEA representative may contact the NDE Title I Office for assistance.

3.1.2 Criteria Questions

Criteria questions are provided for Fall, Spring and On-site Desktop monitoring. Criteria questions filter out the non-applicable categories and compliance items contained within the monitoring tool. Once LEAs answer the criteria questions with either a "Yes" or "No", only those items that apply to that district will remain for LEA to address.

3.1.3 Fall Desktop Compliance Items

As indicated in the eNOTE Tracker manual, criteria questions must first be answered with either a yes or no before a district may continue and address each required Fall Desktop Compliance item. Requested documents and/or items may exist for each item. Additionally, resources and the law citation are provided for each item.

The following table lists the Fall Desktop Compliance categories, items and requested document/evidence:

Fall Desktop Categories • *Legal Citations*	Items	Requested Documents and/or Evidence
Fiscal Requirements • *ESEA §1120A(b)* • *ESEA §1120A(c)*	• Comparable Services • Supplement Not Supplant	• Comparability Report/ Documentation • District and School Budgets
Parent Involvement • *ESEA §1118(a)(2)* • *ESEA §1118(a)(3)* • *ESEA §1118(b)(1)* • *ESEA §1118(d)*	• Parent Involvement Activities • Parent Involvement Policy – School • Parent Involvement Policy – District • School/Parent Compact	• ePAGE Application Set Aside Page • School PIPs; School PIP Content Checklists • District PIP; District PIP Content Checklist • School/Parent Compacts; Compact Supporting Documents (agendas, meeting notes, etc.)
Preschool Programs • *ESEA §1112(b)(1)(K)* • *ESEA §1112(b)(1)(E)(i)* • *ESEA §1113* • *ESEA §1114(a)(1)* • *ESEA §1115(b)(1)(A)(ii)*	• Title I Served Preschool Program Descriptions • Title I Funding for Pre-K • Numbers served • Assessments	• Title IA Pre-K Programs District/School Summary Spreadsheet
Private Schools • *ESEA §1120(a)(3)* • *ESEA §1120(a)(4)*	• Equitable Services	• ePAGE Private School Documents – Set-Aside & PPA pages • Equitable Services Reservations Worksheet
Qualifications and HQ Status • *ESEA §1111(h)(6)* • *ESEA §1114(b)(1)(C)* • *ESEA §1119(c-e), (g)* • *ESEA §1119(l)* • *ESEA §9101(23)*	• HQ Teachers and Paraprofessionals • Professional Development Activities	• Notification Letters on Request for Teacher/ Parapro Qualifications and Being Taught by a Non-HQ teacher; Parapro Database • ePAGE Application Set-

		Aside Page
School Improvement • *ESEA §1116(a)(1)(C)* • *ESEA §1116(b)(6)*	• Annual Review and NSPF Rating (Performance Status) • School Performance Plan and Consultation	• NSPF School Rating Parent Notification Letter • School Performance Plans (SPP) • SPP supporting documents (e.g., sign-in sheets, agendas, SPP review rubrics, etc.)
Schoolwide Programs • *ESEA §1114(b)* • *ESEA §1114(b)(1)(A)* • *ESEA §1114(b)(1)(B)* • *ESEA §1114(b)(1)(E)* • *ESEA §1114(b)(1)(J)* • *ESEA §1114(b)(2)(B)(ii)* • *ESEA §1114(b)(2)(B)(iv)* • *ESEA §1119*	• Schoolwide Plan Components – Required Elements • Coordination of Programs – Schoolwide • Parent Involvement – Schoolwide Plans	• SPPs, specifically Component III and IV of SPPs and participant list
Targeted Assistance Schools • *ESEA §1115(2)(A)* • *ESEA §1115(b)(1)(B)* • *ESEA §1115(c)(1)(C)* • *ESEA §1115(1)(F)* • *ESEA §1115(1)(G)* • *ESEA §1115(2)(C)*	• Coordination of Programs – Targeted Assistance • Program Components Targeted Assistance • Program Staff and Professional Development - Targeted	• SPPs • Targeted Assistance Plan; Targeted Assistance Program Design Documents (e.g., agendas, sign-in sheets, etc.) • Paraprofessional Database; PD support documents (e.g., agendas, sign-in sheets, flyers, announcements, etc.)

3.1.4 Spring Desktop Compliance Items

As indicated in the eNOTE Tracker manual, criteria questions must first be answered with either a yes or no before a district may continue and address each required Spring Desktop Compliance item. Requested documents and/or items may exist for each item. Additionally, resources and the law citation are provided for each item.

The following table lists the Spring Desktop Compliance categories, items and requested document/evidence:

Spring Desktop Categories • *Legal Citation*	Items	Requested Documents and/or Evidence
Eligibility & Use of Funds • *ESEA §1113(a)(1)* • *ESEA §1113(a)(5)* • *ESEA §1113(a)(3)*	• Use of Title I Funds • Measure of Poverty • Set-Asides	• ePAGE documents, including eligibility page, per pupil amount (PPA) page & set-aside page
Fiscal Requirements • *ESEA §1120A(a)* • *ESEA §1120A(b)*	• Maintenance of Effort • Supplement not Supplant • Title I Expenditures • Time and Effort • Title I Equipment Inventory	• Maintenance of Effort Report • Semi-annual Certifications • Time and Effort Reports • Title I Equipment

	• Audit Report	Inventory list/spreadsheet • Audit Reports (e.g., A-133) • School/District Budgets
LEA Plan & Report Card • *20 USC 6311(h)(2)(B)* • *ESEA §1111(h)(2)*	• LEA Annual Report Card • LEA Plan	• LEA Report Card • LEA Plan
Parent Involvement • *ESEA §1118(a)(3)*	• Parent Involvement Activities	• ePAGE Application Set-Aside Page
Preschool Programs • *ESEA §1112(b)(1)(K)* • *ESEA §1112(b)(1)(E)(i)* • *ESEA §1113* • *ESEA §1114(a)(1)* • *ESEA §1115(b)(1)(A)(ii)*	• Title I Served Preschool Program Descriptions • Title I Funding for Pre-K • Numbers served • Assessments	• Title IA Pre-K Programs District/School Summary Spreadsheet
Private Schools • *ESEA § 1120A(b)* • *ESEA § 1120(a)(4)*	• Private School Consultation • Private School Funds	• Signed Affirmation Forms • Equitable Services Reservation Worksheet; ePAGE Application Set-Aside Page
Qualifications for Teachers and Para-professionals • *ESEA §1119(I)*	• Professional Development Activities	• ePAGE Application Set-Aside Page
School Improvement • *ESEA § 1116(b)(1)(E)* • *ESEA § 1116(b)(5)(A)* • *ESEA § 1116(b)(7)(C)(i)* • *ESEA § 1116(b)(8)(A)(i)* • *ESEA § 1116(e)(12)(C)*	• School Choice and SES (optional per Nevada's ESEA Flexibility Waiver)	• ePAGE Application Set-Aside Page
Schoolwide Programs • *ESEA § 1114(b)(1)(E)*	• Teacher Recruitment	• EDT Plan • SPP

3.1.5 On-site Desktop Compliance Monitoring

As indicated in the eNOTE Tracker manual, criteria questions must first be answered with either a yes or no before a district may continue and address each required On-site Desktop Compliance item. Requested documents and/or items may exist for each item. Additionally, resources and the law citation are provided for each item.

The following table lists the On-site Desktop Compliance categories, items and requested document/evidence:

On-site Desktop Categories	Items	Requested Documents and/or Evidence
Eligibility & Use of Funds • *ESEA §1113(a)(1)* • *ESEA §1113(a)(5)* • *ESEA §1113(a)(3)*	• Use of Title I Funds • Measure of Poverty • Set-Asides	• ePAGE documents, including eligibility page, per pupil amount (PPA) page & set-aside page
Fiscal Requirements	• Audit Report	• Comparability Report/

		Documentation
• *ESEA §1120A(a)* • *ESEA §1120A(b)* • *ESEA §1120A(c)*	• Comparable Services • Maintenance of Effort • Supplement Not Supplant • Time and Effort • Title I Equipment Inventory • Title I Expenditures	• District and School Budgets • Maintenance of Effort Report • Semi-annual Certifications • Time and Effort Reports • Title I Equipment Inventory list/spreadsheet • Audit Reports (e.g., A-133)
LEA Plan and Report Card • *20 USC 6311(h)(2)(B)* • *ESEA §1111(h)(2)*	• LEA Annual Report Card • LEA Plan	• LEA Report Card • LEA Plan
Parent Involvement • *ESEA §1118(a)(2)* • *ESEA §1118(a)(3)* • *ESEA §1118(b)(1)* • *ESEA §1118(d)*	• Parent Involvement Activities • Parent Involvement Policy – School • Parent Involvement Policy – District • School/Parent Compact	• ePAGE Application Set-Aside Page • School PIPs; School PIP Content Checklists • District PIP; District PIP Content Checklist • School/Parent Compacts; Compact Supporting Documents (agendas, meeting notes, etc.)
Preschool Programs • *ESEA §1112(b)(1)(K)* • *ESEA §1112(b)(1)(E)(i)* • *ESEA §1113* • *ESEA §1114(a)(1)* *ESEA §1115(b)(1)(A)(ii)*	• Title I Served Preschool Program Descriptions • Title I Funding for Pre-K • Numbers served • Assessments	• Title IA Pre-K Programs District/School Summary Spreadsheet
Private Schools • *ESEA §1120(a)(3)* • *ESEA §1120(a)(4)* • *ESEA § 1120A(b)* • *ESEA § 1120(a)(4)*	• Equitable Services • Private School Consultation • Private School Funds	• ePAGE Private School Documents • Equitable Services Reservations Worksheet • Signed Affirmation Forms • Equitable Services Reservation Worksheet; ePAGE Application Set-Aside Page
Qualifications for Teachers & Paraprofessionals and HQ Status • *ESEA §1111(h)(6)* • *ESEA §1114(b)(1)(C)* • *ESEA §1119(c-e), (g)* • *ESEA §1119(l)* • *ESEA §9101(23)*	• HQ Teachers and Paraprofessionals • Professional Development Activities	• Notification Letters on Request for Teacher/ Parapro Qualifications and Being Taught by a Non-HQ teacher; Parapro Database • ePAGE Application Set-Aside Page
School Improvement • *ESEA §1116(a)(1)(C)* • *ESEA §1116(b)(6)*	• Annual Review and NSPF Rating (Performance Status) • School Performance Plan and Consultation	• NSPF School Rating Parent Notification Letter • School Performance Plans • SPP supporting

		documents (e.g., sign-in sheets, agendas, SPP review rubrics, etc.)
School Improvement • *ESEA § 1116(b)(1)(E)* • *ESEA § 1116(b)(5)(A)* • *ESEA § 1116(b)(7)(C)(i)* • *ESEA § 1116(b)(8)(A)(i)* • *ESEA § 1116(e)(12)(C)*	• School Choice and SES (optional per Nevada's ESEA Flexibility Waiver)	• ePAGE Application Set-Aside Page
Schoolwide Programs • *ESEA §1114(b)* • *ESEA §1114(b)(1)(A)* • *ESEA §1114(b)(1)(B)* • *ESEA §1114(b)(1)(E)* • *ESEA §1114(b)(1)(J)* • *ESEA §1114(b)(2)(B)(ii)* • *ESEA §1114(b)(2)(B)(iv)* • *ESEA §1119*	• Schoolwide Plan Components – Required Elements • Coordination of Programs – Schoolwide • Parent Involvement – Schoolwide Plans • Teacher Recruitment	• SPPs, specifically Component III and IV of SPPs and participant list • EDT Plan
Targeted Assistance Schools • *ESEA §1115(2)(A)* • *ESEA §1115(b)(1)(B)* • *ESEA §1115(c)(1)(C)* • *ESEA §1115(1)(F)* • *ESEA §1115(1)(G)* • *ESEA §1115(2)(C)*	• Coordination of Programs – Targeted Assistance • Program Components Targeted Assistance • Program Staff and Professional Development - Targeted	• SPPs • Targeted Assistance Plan; Targeted Assistance Program Design Documents (e.g., agendas, sign-in sheets, etc.) • Paraprofessional Database; PD support documents (e.g., agendas, sign-in sheets, flyers, announcements, etc.)

3.1.6 Entering and Submitting Desktop Information

The LEA reviews operations of Title I, Part A programs at both the LEA and School site levels, and assembles its own and requested documentation to demonstrate compliance with the requirements of Title I, Part A of the ESEA. The LEA utilizes the web-based system, eNOTE Tracker, to submit responses, evidence/documents (required and supporting) and indicators of compliance by logging in at https://enote.doe.nv.gov/.

The eNOTE Tracker User Manual provides detailed information on how to access and navigate the web-based system. The step-by-step manual will guide LEA users throughout all aspects of entering, uploading, and submitting responses and evidence/documents.

3.1.7 Submission Due Dates

All submission dates are posted in eNOTE Tracker. The following summarizes the submission due dates:
- Fall Desktop: On or before December 30, LEAs must complete and submit Fall Desktop Monitoring items to NDE through eNOTE Tracker.

- Spring Desktop: On or before May 15, LEAs must complete and submit Spring Desktop Monitoring items to NDE through eNOTE Tracker.
- On-site Desktop: On or before March 15, LEAs must complete and submit On-site Desktop Monitoring items to NDE through eNOTE Tracker. Assigned EPPs will coordinate with LEAs selected for On-site visits to ensure the On-site Desktop items are submitted prior to the On-site visit.

3.1.8 Desktop Review Process

NDE Education Programs Professionals (EPP), assigned to specific Title I LEAs, review the LEA's submitted responses, evidence/documents (required and supporting) and indicators. After an LEA submits its Desktop monitoring for review, the EPP will "receive" the submission and begin reviewing the items to determine compliance with the requirements of the ESEA and/or if more evidence is need to demonstrate compliance.

EPPs use the provided legal citations to guide compliance determinations with each item. After review, comments are provided by the EPP on each compliance item either indicating acknowledgement of meeting the requirements of the item ("Meets Requirements") or an explanation of what is still needed in order for the LEA to demonstrate compliance with an item. If requested documents/evidence are not provided and/or any item questions are not addressed by the LEA, that requires an automatic determination of "Does Not Meet Requirements." If this is the case, EPPs also indicate what is still needed and the timeframe that follow-up information must be provided. Generally, an LEA will have 2 weeks in which to provide the requested information. Once the additional evidence and/or information is submitted, reviewed and approved, the EPP will indicate the compliance item is "Resolved" in eNOTE Tracker and no further action is required.

3.1.8.1 Corrective Action Plan

There are also instances when an LEA is not in compliance with an item and will be required to follow a corrective action plan. A corrective action plan is developed in collaboration between the LEA and NDE staff. The action plan will identify the necessary steps that an LEA must follow in order to correct the non-compliant item, including timelines for completion. A corrective action plan is uploaded into eNOTE Tracker, attached to the corresponding item for which the action plan was developed. The NDE EPP would provide a comment on the status and acceptance of the corrective action plan and indicate the item as "Resolved." The EPP is responsible for ensuring that the conditions of the corrective action plan are met by the LEA by the agreed upon date. In the event the corrective action plan conditions are not met, either a revised plan is submitted by the LEA and approved by NDE or a "Progression of Consequences" will be implemented to assist the LEA in meeting the Title I, Part A requirements. (The "Progression of Consequences" is addressed under Section 5).

3.1.9 Submittal and Review Notifications

In all review instances automated emails will be sent to LEAs and assigned EPPs when certain submittal and review actions are conducted within eNOTE Tracker. For example, when an LEA submits its eNOTE Tracker Compliance items for review, the assigned NDE EPP will receive a "Submitted" email for that LEA. Likewise, once the EPP has reviewed all submitted eNOTE Tracker Compliance items, the EPP will complete the process and an email will be sent to the LEA indicating "Needs Further Action" or "Accepted."

3.1.10 Desktop Final Approval

Final Approval of reviewed Desktop Compliance Monitoring items will be indicated in the eNOTE Tracker system by the EPP selecting "Accepted." An automated

message to appropriate LEA and NDE staff will be sent indicating that it was "Accepted" with no further action needed.

3.1.11 Desktop Reports
All final desktop reports will be posted on the NDE website for public view. These reports can be found on the Title I, Part A Monitoring page. Depending on the necessary steps taken to ensure compliance, it can be anticipated that finalized reports will be posted within 3 months of established due dates.

4   On-Site Monitoring

At one point during the 4 year monitoring cycle, LEAs will participate in an On-site Monitoring Visit (which can be found on the NDE website). On-site Monitoring Visits, coupled with On-site Desktop Compliance Monitoring, provide an in-depth review of an LEA's implementation of the required components of Title I, Part A programs and requirements.

4.1 Notification of On-site Monitoring Visit
LEAs are notified of the On-site Monitoring Schedule well in advance of their assigned year for the visit. The On-site Monitoring Visit Schedule is posted on the NDE website and is distributed to LEAs through email communications and Title I Coordinator's meetings. Additionally, eNOTE Tracker indicates per year the LEAs that will participate in the on-site visit process.

4.1.1   Notification Letter
In order to establish a date for the On-site Monitoring Visit, the assigned EPP Monitoring Lead will contact the participating LEA Title I Coordinator to select a mutually agreed upon date(s). Once the date(s) are established, the assigned EPP Monitoring Lead will send a letter to the LEA representative indicating the visit dates as well as supporting documents that outline the proposed schedule and activities for the upcoming monitoring visit. Within the schedule, the anticipated NDE monitoring staff conducting the visit will be identified.

4.1.1.1   On-site Title I Monitoring Visit Preparation Protocol
A preparation protocol is provided to all participating On-site Monitoring Visit LEAs. The protocol describes the On-site Monitoring activities and what preparation is needed for the visit. It covers suggested LEA personnel who should participate, locations of visits (e.g., schools, Human Resources, Title I Office, etc.), materials needed, focus group and interview participants, and how to approach any necessary schedule changes. The On-site Monitoring Visit Preparation document is posted on the NDE website.

4.1.1.2   Monitoring Schedule
The On-site Monitoring Visit Schedule contains proposed times, activities, locations, NDE and LEA personnel or participants, and any details or notes that would assist in conducting the site visit. An Example Title I Onsite Monitoring Visit schedule is posted on the NDE website.

4.1.1.3   Focus Group and Interview Protocols
Several interview and focus group protocols have been developed for use during the On-site Visit. Information gathered through interviews and focus groups is used to verify implementation of Title I, Part A requirements. For example, the Parent Focus Group will reveal if school information is shared in an "understandable format," a requirement of Section 1118 in ESEA.

The following chart lists the interview and focus group protocols for various Title I programs and allowable activities that are conducted, as appropriate for each LEA, during an On-site Monitoring Visit:

	Interview or Focus Group	Topics
1.	Teacher(s) Interview	General Title I Overview; School Performance & Improvement; Fiscal/Budget Development; Professional Development; Student Achievement
2.	Principal(s) Interview	General Title I Overview; School Performance & Improvement; Fiscal/Budget Development; Professional Development; Student Achievement; Paraprofessionals; Homeless
3.	Parent Focus Group	School Performance & Improvement; Decision Making; Student Achievement; Communication
4.	School Performance Planning Interview	Support for Title I Schools in Performance Planning; Review of SPPs; LEA Resource Support for Low-performing Title I Schools; Parent Notification of Title I School Status
5.	Fiscal Team Interview	Accomplishments and Challenges of Fiscal Planning; Budgeting process for Title I Schools; Fiscal Grants Management System
6.	LEA Title I Staff Interview	Duties, Accomplishments, Challenges; Goals for LEA Title I program
7.	Human Resources/EDT Interview	Highly Qualified Teachers; EDT; Low-performing Title I School Access to HQ Teachers
8.	Homeless Interview	District and School Homeless Liaisons; Title I set aside for Homeless
9.	SES/School Choice Team Interview	Eligible Students for SES and/or School Choice; Number of participating students; Program delivery; Communication with Parents
10.	Private School Officials Focus Group	Consultation; Selection of Participating Students; When Equitable Services Started; Assessment, Monitoring, Exiting of Participating Students; End of Year Activities; Input.
11.	Preschool Team Interview	Title I Pre-K Program Design and Program Requirements; Number and Ages of Students Served; Program Evaluation.

Each Interview and Focus Group Protocol can be found on the NDE website by clicking on the Interview or Focus Group titles above. All interview and focus school questions may be adapted or revised to meet the specific needs of the On-site Monitoring team and to match the programs that each LEA provides. The first 8 interviews or focus groups listed in the chart above are conducted in each LEA. The remaining interviews/focus groups are conducted only if the LEA provides that Title I services or programs. Additionally, the teacher and principal interviews are conducted at each visited Title I school.

4.2 NDE Title I, Part A Monitoring Team

The NDE Monitoring Team consists of relevant NDE staff. The NDE On-site Visit Monitoring Lead is typically the assigned Title I EPP to the LEA. The assisting NDE Staff monitoring team members may include, but are not limited to the following: Title I, Title II-A, Title III/ELL, Special Education, 21st CCLC, Homeless, and/or Pre-K EPPs. In addition, staff from other NDE Offices, such as Striving Readers, Curriculum and Assessment and/or Fiscal, may participate on the NDE On-site Monitoring team.

The NDE monitoring team members are selected based on the programs the LEA provides with Title I funds, in part or in whole. Consideration is made towards assembling a team that will provide insight relative to implementation of these programs and services as well as any necessary expertise or technical assistance that the LEA may find beneficial.

4.3 On-site Monitoring Visit Activities

The Title I On-site Monitoring Visit Schedule outlines the necessary monitoring visit activities for each LEA. The schedule and activities will vary depending on the programs that an LEA offers. The following items describe the activities that each LEA will experience as well as the activities that they may experience if offered at that LEA:

4.3.1   eNOTE Tracker On-site Desktop Submission Review

The LEA's On-site Desktop Compliance Monitoring submission is reviewed with the LEA's Title I Coordinator and staff. Prior to NDE's visit, the submission had already been reviewed, comments provided, and, if necessary, additional information in order to determine compliance was requested.

During this portion of the on-site visit, NDE staff reviews and discusses each relevant item from the on-line submission with LEA Title I Staff. Questions regarding the compliance item are addressed and technical assistance around acceptable and required evidence is provided. Any outstanding "Does Not Meet Requirements" items are highlighted and specifically addressed with LEA staff. LEA staff are reminded or notified of any established due dates within eNOTE Tracker.

4.3.2   Title I School Site Visits

NDE staff preselect Title I schools for the On-site Monitoring Visit, as reflected in the monitoring schedule. Ideally, all Title I schools are visited; however, some districts have more Title I schools (e.g., over 200 Title I served schools) than are feasible to visit. In this case, a representative sample of schools is selected by NDE staff for visitation. For example, 2 Title I schools per grade span – Elementary, Middle, and High School – are selected with consideration towards each school's performance status (e.g., visiting low, middle and high performing schools within the representative sample).

The school on-site visits will focus on teacher and principal interviews and discussion around development and implementation of the school's performance/schoolwide and/or targeted assistance plan. Prior to the on-site visit, each school's plan will be reviewed utilizing the SPP Rubric, which includes Title I Schoolwide elements, to determine if all requirements have been addressed within the plan. The SPP Rubric results will be shared and discussed with the school. If any area of the plan does not meet requirements, then NDE staff will identify what revisions are necessary to meet requirements and when those revisions are due. In the event a school provides a Targeted Assistance Title I program (vs. a schoolwide program), then the SPP Rubric section that addresses Schoolwide programs will not be used. Instead, NDE staff will review and discuss the Targeted Assistance Title I program. The SPP Rubric and the elements of a Targeted Assistance Program can be found on the NDE website.

4.3.3   Interviews and Focus Groups

Interview protocols have been developed for Principals, Teachers, School Performance and Improvement Teams, Fiscal Teams, Human Resources Teams, Preschool Teams, and LEA Title I Staff, as detailed under 4.1.1.3 of this guide. The NDE monitoring team will use the set of interview questions developed for each group during the monitoring visit. Typically, interviews are conducted with one or two individuals representing the LEA in their particular area. The District Title I Coordinator or other LEA Designee notifies these individuals of their involvement in the on-site monitoring process and provides the date, time and location of the interview.

Focus group protocols have been developed for parents and private school officials who participate in some capacity with the LEA's Title I programs. Focus Groups are assembled by the LEA Title I Coordinator or Designee. Approximately 10 to 15 parents whose children attend a Title I school are asked to attend the Focus Group to provide information and feedback to the NDE monitoring team. All participating Private School Officials are asked to attend the Private Schools (Equitable Services for Eligible Private School Children) Focus Group. Again, through the established questions, information and feedback is solicited by the NDE Monitoring Team.

The full set of Interview and Focus Group protocols outlined under 4.1.1.3 can be found on the NDE website.

4.3.4   Exit Meeting/Wrap-up

At the end of the on-site monitoring visit, the NDE Lead will facilitate an Exit Meeting with the LEA. The purpose of this meeting is for NDE Staff to field any questions the LEA staff may have around the monitoring visit and to share initial impressions relative to the information that was gathered. If possible, the NDE Lead will share anticipated findings, pending further review of legal citations and guidance. Accommodations regarding exemplary practices or innovative approaches will be shared with LEA staff as well.

4.4 On-site Monitoring Visit Report

The NDE Lead is responsible for developing the On-site Monitoring Visit Report. This is in addition to the eNOTE Online Desktop Onsite Report. Within 25 working days, a report detailing the visit observations and findings will be sent to the LEA Title I Coordinator or Designee. The report will also be uploaded into eNOTE Tracker under the appropriate On-site item. Commendations, Recommendations, and/or Action Items for each monitored area will be addressed.

4.4.1   Commendations

In any monitored area, the NDE monitoring team may identify a policy or practice that is to be commended. Any such commendations are reflected in the On-site Monitoring Report.

4.4.2   Recommendations

When monitoring Title I, Part A programs and activities, the NDE monitoring team may find areas that are compliant with the requirements of ESEA, but may benefit from a recommendation that could improve the policy or practice. The recommendation may reflect discussions that occurred during the on-site visit where problem solving conversations revealed improved options in implementation. In any event, the LEA On-site Monitoring Visit Report may reflect recommendations that LEAs could consider implementing. LEAs are not required to implement these recommendations; rather the recommendations serve more as a technical assistance opportunity for NDE staff to provide support and insight in implementing effective Title I-A programs.

4.4.3   Action Items

Action Items are areas that the NDE monitoring team found to be non-compliant with the requirements of Title I, Part A. In the event Action Items are identified for the LEA, the report will indicate what additional information must be provided or action performed in order to become compliant with the identified Title I, Part A requirement. LEAs must respond to the NDE within 30 days of receipt of the On-site Monitoring Visit Report addressing the identified Action Items.

4.4.3.1 Resolving Action Items

Typically Action Items can be resolved by LEAs within the 30-day report response period. In these instances, LEAs address Action Items within their response to the On-site Monitoring Visit Report by including the following information in their follow-up to the report: identification of the specific non-compliant Title I item, a description of the steps that were taken to resolve the non-compliant item, a list of the staff who were responsible for addressing the item and any documents that verify compliance with the identified item.

4.4.3.2 Corrective Action Plan

For non-compliant items that cannot be resolved within the 30-day period, a corrective action plan will be required from the LEA. The LEA must develop a plan that identifies the necessary steps that it will follow in order to correct the non-compliant item, including timelines for completion. The corrective action plan is submitted to the NDE within the 30-day response time that is followed after the LEA's receipt of the On-site Monitoring Visit Report.

The Lead EPP is responsible for ensuring that the conditions of the corrective action plan are met by the LEA by the agreed upon date. In the event the corrective action plan conditions are not met, either a revised plan is submitted by the LEA and approved by the NDE or a "Progression of Consequences" will be implemented to assist the LEA in meeting the Title I, Part A requirements. (The "Progression of Consequences" is addressed under Section 5).

4.4.4 LEA On-site Monitoring Visit Response and Submission

As mentioned above, LEAs are required to respond to the NDE On-site Monitoring Visit Report within 30-days of receiving the NDE report. All Action Items must be addressed as outlined under 4.4.3.1 and 4.4.3.2. In the event an LEA has no action items to respond to, LEAs are expected to submit a letter to the NDE indicating they were in receipt of the NDE On-site Monitoring Visit Report and that no further action is required as part of the on-site monitoring visit process.

The LEA On-site Monitoring Visit Response must be submitted by uploading the document under the identified On-site Item in eNOTE Tracker. Additionally, it may also be sent via email and/or US Mail.

4.4.5 NDE Response Review

Upon receipt of the LEA response to the On-site Monitoring Visit Report, the NDE will have 10 working days to review and determine if the responses meet the requirements of Title I, Part A. For LEA reports that address all of the action items and meet all necessary requirements, the NDE will indicate that the responses are approved/accepted and that no further action is required relative to addressing the On-site Monitoring Visit Report.

It is possible that the LEA's submitted responses are incomplete or still not meeting requirements. If this is the determination, then the Lead EPP will respond to the LEA in a detailed letter outlining the insufficient items that are still determined to be non-compliant. The NDE will have 10 working days to provide the determination to the LEA. This follow-up communication from the NDE will identify the specific items that still need attention, outline the necessary steps that must be taken by the LEA, and

indicate the timeframe that the LEA must respond to the follow-up request. If the conditions of this second letter from NDE are not addressed by the LEA, then the "Progression of Consequences" process will be the next steps for resolving the non-compliant issues.

4.4.6 NDE Final Approval

Final approval from the NDE will be indicated in eNOTE Tracker through acceptance of the on-line report, which includes the uploading of a letter under the appropriate eNOTE Tracker item that states acceptance of the LEAs actions to resolve any non-compliant items.

5 Progression of Consequences

In the event LEAs are unable to meet the established timelines for resolving non-compliant items found through either desk-top or on-site visit monitoring, the NDE has developed steps and timelines that will guide districts and the NDE through resolving the necessary items. This is described as the Progression of Consequences.

The NDE and the LEAs will utilize a four level progressive series of consequences that includes greater state and LEA management involvement should issues of non-compliance remain unresolved for an extended period of time. The aim of these procedures is to ensure timely support to the LEA to achieve resolution of non-compliant issues and, at the same time, to ensure that the NDE complies with its obligations for monitoring and oversight of LEA use of Title I, Part A resources.

5.1 Level 1: Response to Findings

LEA submits Compliance Resolution (CR) in 15 days or proposed Corrective Action Plan (CAP) in 30 days after Notification of Findings (based on the annual desktop or onsite review).	The NDE reviews CR or CAP and approves, providing technical assistance as needed. CAP may not exceed 180 days.

5.2 Level 2: Additional Support

LEA fails to submit a response in 30 days, or submits an inadequate response or proposal for Corrective Action.	The NDE staff work with LEA staff on revision of proposal. Offer technical assistance.

5.3 Level 3: Increasing Management Engagement

LEA is non-compliant more than 225 days.	The NDE Title I Director and the Deputy Superintendent contact the LEA Superintendent via letter to inform him/her that the LEA is non-compliant more than 225 days, and that the NDE will notify the local governing board if compliance resolution has not occurred after 365 days.

5.4 Level 4: Enforcement

LEA is non-compliant more than 365 days.	The NDE Superintendent sends a letter to the local board president notifying him/her that the LEA has been non-compliant more than 365 days. The Nevada Board of Education initiates sanctions against the LEA.

5.5 Possible Extension Opportunities

In extraordinary cases, the fourth level – reached when an LEA is non-compliant more than 365 days – may be delayed by the NDE when an LEA has provided substantial evidence of good faith progress on issues of great difficulty and scale.

Any such extensions of Corrective Action Plans must be supported by evidence of actions taken to partially or substantially resolve a compliance issue. A decision to extend a Corrective Action Plan beyond 365 days may be made only by the State Superintendent of Public Instruction, in consultation with the district Superintendent and the governing board of the LEA. Any time the NDE is considering sanctions that would impact LEA funding, the LEA has a right to appeal that decision to the State Superintendent of Public Instruction.

5.6 Possible Sanctions

Possible sanctions for LEAs found to be non-compliant for more than 365 days include, but are not limited to:

- Suspension of the LEA's spending authority;
- Withholding payment of reimbursements claimed; and
- Requiring re-payment of selected Title I funds.